

## **REMARKS**

Claims 1-54 are pending in this application. By this amendment, claims 1, 2, 27 and 31 have been amended. Reconsideration and withdrawal of the rejections set forth in the Office Action dated February 8, 2006, is respectfully requested in view of this amendment.

The amendments include the addition of the limitation of a master control processor into independent claims 1 and 27. This feature had appeared in claims 2 and 31, which were amended accordingly. It is respectfully submitted that the above amendments introduce no new matter within the meaning of 35 U.S.C. §132. In the outstanding Office Action, the Examiner rejected claims under 35 U.S.C. §103(a) as unpatentable over the basic reference of the *Rao* U.S. Patent No. 6,674,756 in view of further references. These rejections, as applied to the revised claims, are respectfully traversed.

### **Rejections Under 35 U.S.C. §103**

**The rejection of claims 1, 9, 10 and 27-30 under 35 U.S.C. 103(a)  
over *Rao* taken in view of Jourdenais, et al., *Jourdenais*.**

### **Response**

This rejection, as applied to the amended claims, is respectfully traversed. The invention as claimed in claim 1 specifies:

"... a host router running a common operating system and a master control processor ... virtual router domains and processes logically partitioned within [the] host router, each ... process running in a ... virtual router domain independently of all other ... virtual router domains on top of said common operating system ... ."

Claim 27 specifies:

A method of logically partitioning a host router into virtual router domains, comprising configuring the kernel of a single common operating system running in said host router ... generating an independent identical set of replica arrays of global variables for each [of a plurality of] virtual router domain; and associating a process with each said virtual router domain of said host router, such that said processes run in said virtual router domains independently of one another on top of said single common operating system of said host router using a master control processor.

There is no suggestion in the prior art of record that a host router use a common operating system, and also a master control processor. Specifically, *Rao* is directed to a multi-service network switch in which a plurality of virtual routers are used, each virtual router having resources and routing tables. No master control processor is used in combination with a single common operating system running in a host router.

*Jourdenais* is used to show scalable variables stored in an array, but fails to suggest the common operating system and master control processor combination. Therefore *Jourdenais* cannot be used to suggest using the variables stored in an array in the implementation of a common operating system and master control processor combination.

Furthermore, it is pointed out that the use of the common operating system in combination with the master control processor is significant because the prior art of record, while

suggestive of processes run independently and in a self-contained manner, does not suggest doing so while using a common operating system.

**The rejection of claims 2 and 31 over *Rao* in view of *Jourdenais*, taken further in view of general understanding of networking and applicant admitted prior art.**

**Response**

This rejection, as applied to revised claims 1 and 27, as well as to claims 2 and 31, is traversed for the set forth above. Specifically, there is no suggestion in the combination of a master control processor is used in combination with a single common operating system running in a host router.

**The rejection of claims 4-7, 11-14 and 33-41 over *Rao*.**

**Response**

This rejection, as applied to the amended claims, is respectfully traversed for the reasons set forth above in connection with claims 1 and 27. The combination fails to suggest implementation of a common operating system and master control processor combination.

**The rejection of claims 15 and 43 taken in view of *Jourdenais*, taken further in view of general understanding of networking and applicant admitted prior art.**

**Response**

This rejection, as applied to the amended claims, is respectfully traversed for the reasons set forth above in connection with claims 1 and 27. Accordingly, there can be no showing of such a combination in combination of a host router having the 320 interface ports set forth in the description. Clearly the 320-interface port implementation provides a functionality which is distinct from that of implementations which do not provide router virtual networks; however the

prior art of record fails to suggest the basic combination of a common operating system and master control processor.

**The rejection of claims 16-19, 21-26, 43-47 and 49-54 over *Rao*.**

**Response**

This rejection, as applied to the amended claims, is respectfully traversed for the reasons set forth above in connection with the above dependent claims. The combination fails to suggest implementation of a common operating system and master control processor combination.

Therefore, the use of a socket configuration (claims 16-17, 19, 43-44 and 47), processes movable between domains (claims 18 and 45), use of independent routing tables for virtual router domains or sockets using routing tables of particular virtual routing domains (claims 21-22, 24-26 and 49-50 and 52-54) cannot be shown by the combination.

The use of multiple router domains using the same IP address without conflicting (claims 23 and 51) is not suggest by the prior art combination. Furthermore, it would take "hindsight reasoning" to use multiple router domains on the same system using the same IP address without conflicting. This is achieved by the use inventive techniques.

The combination further fails to suggest the claimed implementation with a file descriptor table (claim 46).

**The rejection of claims 20 and 48 under 35 U.S.C. 103(a) over *Rao* taken in view of *Jourdenais*, take further in view of *Snay*, et al., US 6,282,678 (hereinafter *Snay*).**

**Response**

This rejection, as applied to the amended claims, is respectfully traversed. These two claims discuss using one of the sockets as a virtual test bed. This is an interesting combination

because one is testing the operation of the invention as set forth in the claims from which claims 20 and 48 depend. The use of test bed within system which uses a common operating system and master control processor combination is not suggested by *Snay* in combination with the other references because the combination is not suggested by the other references.

This is more significant than the aggregation of references, because the ability to perform test bed operations sets forth a routine which is a specific capability of the system. The underlying combination is absent in the prior art teaching, and therefore it cannot be shown that the underlying combination can be operated with one of the sockets as a virtual test bed.

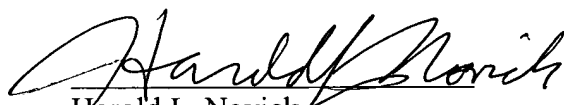
### CONCLUSION

In light of the foregoing, Applicants submit that the application is in condition for allowance. Applicant respectfully request that the Examiner withdraw the rejections and the case be passed to issuance. If the Examiner believes the application is not in condition for allowance, Applicants respectfully request that the Examiner call the undersigned.

Respectfully submitted,

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